

### **REMARKS**

Claims 1-22 are pending in the application and stand rejected. Claims 1, 15 and 21 have been amended. The specification has been amended. A marked-up version illustrating the claim amendments and specification amendments is annexed hereto. The Examiner's reconsideration of the specification objections and claim rejection is requested based on the above amendments and following remarks.

#### **Specification Objections**

The specification was objected to for the reasons set forth on page 2 of the Office Action. Applicants have amended the specification as suggested. Therefore, withdrawal of the objections is requested.

#### **Claim Rejections - 35 U.S.C. § 112**

Claim 15 was rejected under 35 U.S.C. § 112, second paragraph, for the reasons set forth on page 2 of the Office Action. Claim 15 has been amended as suggested. Accordingly, withdrawal of the rejection is requested.

#### **Claim Rejections - 35 U.S.C. § 101**

Claims 1-7 and 21 were rejected under 35 U.S.C. § 101 for the reasons set forth on page 3 of the Office Action. The preamble of claims 1 and 21 have been amended as suggested. Therefore, the withdrawal of the rejection is requested.

#### **Claim Rejections Under 35 U.S.C. § 103**

Claims 1-3, 5, 8-10, 12, 15, 17-18 and 20-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,826,025 to Gramlich ("Gramlich"), for the reasons set forth on pages 4-7 of the Office Action. Applicants respectfully traverse the

rejections. In particular, at the very minimum, Applicants respectfully submit that Gramlich does not establish a prima facie case of obviousness against claims 1, 8, 15, 21 and 22.

Claims 1, 8, 15, 21 and 22 are generally directed to systems and methods for constructing objects. The claimed inventions include *determining an order* for constructing objects based on *inclusion relationships* between an object and a fragment or inclusion relationships between a plurality of fragments. An object is then constructed based on the *inclusion relationships* and the *determined order*.

To begin with, Applicants respectfully disagree with Examiner's interpretation of "annotation overlays" of Gramlich as teaching "*fragments*" as currently claimed. Indeed, a *fragment* is defined in Applicants' specification as being "an object which is used to construct a compound object" (wherein a compound object is an object that is constructed from one or more fragments) (see, e.g., page 6, lines 14-19). In contrast, "annotation overlays" as taught by Gramlich are merely files with directives that are used to modify the content of Web documents. One of ordinary skill in the art would not consider an "annotation overlay" of Gramlich as a component of an object or compound object.

Further, Applicants respectfully disagree with the contention that Gramlich teaches *determining an order* for constructing objects based on *inclusion relationships* between an object and a fragment or *inclusion relationships* between a plurality of fragments, and then constructing an object based on the determined order, as essentially claimed in claims 1, 8, 15, 21 and 22. Indeed, *inclusion relationships* as contemplated by the claimed inventions are essentially logically relationships that set forth what fragments or objects are included in an

object (which is to be constructed using such included objects and fragments) (see, e.g., pages 7 and 8 of Applicants' specification).

It is respectfully submitted that there is no teaching or suggestion in Gramlich with respect to *inclusion relationships*, much less *determining an order for constructing objects based on such inclusion relationships*. As noted above, the "annotation overlays" of Gramlich are not *included* in objects *per se*, and consequently, there is no need for inclusion relationships that set forth how annotation overlays are included in web pages. Again, the annotation overlays of Gramlich simply provide directives for modifying the content of web pages (i.e., deleting or inserting content in the web pages).

Further, with respect to claim 15, in addition to the reasons given above, it is respectfully submitted that there is nothing in Gramlich that remotely teaches or suggests *a content authoring system adapted for generating fragments and providing include relationships between the fragments*.

Accordingly, claims 1, 8, 15, 21 and 22 are believed to be patentable and non-obvious over Gramlich. Further, claims 2-3, 5, 9-10, 12, 17-18 and 20 are believed to be patentable and non-obvious over Gramlich for at least the above reasons by virtue of the dependence of such claims from respective base claims 1, 8, 15, 21 and 22.

Further, claims 4 and 11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gramlich in view of U.S. Patent No. 5,911,145 to Arora et al, claims 6, 13 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gramlich in view of U.S. Patent No. 6,144,962 to Weinberg, et al, claims 7 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gramlich in view of U.S. Patent No. 5,870,552 to Dozier, et al, and

claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Gramlich in view of U.S. Patent No. 5,855,015 to Shoham.

The above claim rejections are based, in part, on the contention that Gramlich discloses or suggests the inventions of base claims 1, 8, 15, 21 and 22. However, the cited combinations of references are believed to be legally deficient to establish a prima facie case of obvious because at the very minimum, as discussed above, Gramlich does not teach or suggest the elements of base claims 1, 8, 15, 21 and 22. For all the above reasons, the withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants' undersigned attorney.

Respectfully submitted,



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**Marked-Up Version Illustrating Claim and Specification Amendments**

1. (Amended) A computer-executable method for constructing a plurality of objects comprising the steps of:

providing at least one fragment;

determining an order for constructing objects based on at least one inclusion relationship between an object and the at least one fragment; and

constructing the plurality of objects based on the at least one inclusion relationship and the determined order for constructing the objects.

15. (Amended) A system for constructing a plurality of objects comprising:

a content authoring system adapted for generating fragments and providing include relationships between the fragments;

a dependency parser adapted for receiving the fragments and parsing the include relationships;

a dependency analyzer adapted for determining an [efficient] order for constructing the plurality of objects from the fragments based on the include relationships; and

a constructor adapted for constructing the plurality of objects in the order determined by the dependency analyzer.

21. (Amended) A computer-executable method for constructing a plurality of objects comprising the steps of:

providing a plurality of fragments;

determining an order for constructing objects based on at least one inclusion relationship between the plurality of fragments; and

constructing the plurality of objects based on the at least one inclusion relationship and the determined order for constructing the objects.

#### **IN THE SPECIFICATION**

(i) Please replace the paragraph on page 9, line 13, through page 10, line 4, with the following:

If the authors are not satisfied with the results, the authors may make modifications to the pages and repeat this process until satisfied. Once the authors are satisfied, a set of objects may be passed on to a next group of authors who may modify content or add new content. After all the authors have finished with the Web pages, a censor or proofreader may make a final determination of which pages to publish and which pages to hold back. A quick publishing and censoring system and method which may be used is described in copending U.S. Patent Application Serial No. 09/283,562, entitled "METHOD AND SYSTEM FOR RAPID PUBLISHING AND CENSORING INFORMATION", [Attorney docket number YO999-040(8728-253),] which was filed concurrently herewith, and which is commonly assigned and incorporated herein by reference.

(i) Please replace the paragraph on page 16, line 6, through page 17, line 19, with the following:

Referring to FIG. 3, a block/flow diagram of a system/method for constructing one or more servables is shown. The servables may include compound objects. The servables are preferably represented by templates in a markup language which specifies included fragments using directives of the form described earlier. One key function performed in FIG. 3 is construction of a representation of compound objects which includes directives in templates which are replaced by the actual fragments the directives represent. In block 302, a plurality of information fragments (or objects) are provided. In block 305, a dependency parser is invoked on one or more objects. The dependency parser determines inclusion relationships among objects by searching for include directives in their representations. A dependency analysis is performed in block 310. There are several methods for implementing both blocks 305 and 310. In a preferred method, include relationships are represented between objects using ODG's as described in copending U.S. Patent Application Serial No. 09/283,561, entitled "METHOD AND SYSTEM FOR EFFICIENTLY CONSTRUCTING AND CONSISTENTLY PUBLISHING WEB DOCUMENTS", [Attorney docket number YO999-011(8728-255),] which was filed concurrently herewith, and which is commonly assigned and

incorporated herein by reference. Using this preferred method, a dependency parser 108 (FIG. 1) examines objects for include directives in block 305 and updates ODG's based on the include directives dependency parser 108 identifies. In block 310, a dependency analyzer 112 (FIG. 1) is invoked to determine a correct and efficient order for constructing multiple objects. There are several methods for implementing block 310. A preferred method is described in "METHOD AND SYSTEM FOR EFFICIENTLY CONSTRUCTING AND CONSISTENTLY PUBLISHING WEB DOCUMENTS", previously incorporated herein by reference. This preferred method insures that fragments will be constructed before compound objects which include the fragments.